



Joseph H. Picone
T +1 813.318.5719
F +1 813.318.5900
piconej@gtlaw.com

January 5, 2022

VIA FOIAONLINE.gov

National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue
NW (2310A)
Washington, DC 20460

Re: Freedom of Information Act Request
Hydrofluorocarbon 2022 Allowance Allocations to iGas Holdings, Inc. for
Production and Consumption of Regulated Substances Under the American
Innovation and Manufacturing Act of 2020

Dear FOIA Officer:

This is a request under the Freedom of Information Act (5 U.S.C. § 552).

We respectfully request that the U.S. Environmental Protection Agency (“EPA”) provide copies of the following documents as promptly as possible:

1. All documents (e.g., applications, reports, calculations, data, analysis, etc.) exchanged between EPA and (a) iGas Holdings, Inc.; (b) its subsidiaries, including BMP International, Inc., BMP USA, Inc., iGas USA, Inc., Assured Comfort A/C, Inc., LM Supply, Inc., and Cool Master USA, LLC.; or (c) anyone on their behalf,¹ related to the HFC consumption allowances issued to iGas for calendar year 2022 (the “Allowances”) as shown in *Phasedown of Hydro-fluorocarbons: Notice of 2022 Allowance Allocations for Production and Consumption of Regulated Substances Under the American Innovation and Manufacturing Act of 2020*, 86 Fed. Reg. 55841, 55843 (Oct. 7, 2021).
2. All documents and communications relating to and/or evidencing any and all requests or claims by iGas to transfer, sell, or otherwise alienate any of the Allowances to any other party.

We are willing to pay fees for this request up to a maximum of \$500. If you estimate that the fees will exceed this limit, please inform me first.

¹ iGas Holdings, Inc.; BMP International, Inc.; BMP USA, Inc.; iGas USA, Inc.; Assured Comfort A/C, Inc., LM Supply, Inc., and Cool Master USA, LLC, and anyone on their behalf are collectively referred to as “iGas” in this request.

ALBANY
AMSTERDAM
ATLANTA
AUSTIN
BERLIN[†]
BOSTON
CHICAGO
DALLAS
DELAWARE
DENVER
FORT LAUDERDALE
HOUSTON
LAS VEGAS
LONDON[†]
LOS ANGELES
MEXICO CITY[†]
MIAMI
MINNEAPOLIS
NEW JERSEY
NEW YORK
NORTHERN VIRGINIA
ORANGE COUNTY
ORLANDO
PHILADELPHIA
PHOENIX
SACRAMENTO
SALT LAKE CITY
SAN FRANCISCO
SEOUL[†]
SHANGHAI
SILICON VALLEY
TALLAHASSEE
TAMPA
TEL AVIV[†]
TOKYO[†]
WARSAW[†]
WASHINGTON, D.C.
WEST PALM BEACH
WESTCHESTER COUNTY

[†] OPERATES AS
GREENBERG TRAURIG GERMANY, LLP
[†] OPERATES AS A
SEPARATE UK REGISTERED LEGAL ENTITY
[†] OPERATES AS
GREENBERG TRAURIG, S.C.
[†] OPERATES AS
GREENBERG TRAURIG LLP
FOREIGN LEGAL CONSULTANT OFFICE
[†] A BRANCH OF
GREENBERG TRAURIG, P.A.,
FLORIDA, USA
[†] OPERATES AS
GT TOKYO HORITSU JIMUSHO
[†] OPERATES AS
GREENBERG TRAURIG GRZESIAK SP. J.

January 5, 2022

Page 2

Further, we are willing to accept responsive documents in phases. In other words, please do not let collection of all responsive documents hold up the production of other responsive and releasable documents.

If you have any questions, or if there is additional information that would be helpful, please do not hesitate to contact me. I can be reached directly at piconej@gtlaw.com or 813.318.5719.

Thank you for your prompt consideration and handling of this request.

Best regards,

A handwritten signature in black ink, appearing to read 'JPicone', written in a cursive style.

Joseph H. Picone